

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION

MARGUERITE HOFFMAN,

Plaintiff,

L&M ARTS, DAVID MARTINEZ,  
and STUDIO CAPITAL, INC.,

Defendants.

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Civil Action No. 3:10-CV-0953-D

**PLAINTIFF’S REPLY IN SUPPORT OF HER MOTION FOR  
ISSUANCE OF A REQUEST FOR INTERNATIONAL JUDICIAL ASSISTANCE**

Plaintiff Marguerite Hoffman moved this Court to issue a Request for International Judicial Assistance to Obtain Evidence to Be Used in a Civil or Commercial Proceeding, directed to the Senior Master of the Queen’s Bench Division of the Supreme Court of England and Wales, requesting the deposition and production of documents by Lavinia Calza on January 18, 2012 (the “Request”) [Dkt. No. 181]. On January 23, 2012, Defendants Studio Capital and David Martinez filed its response to Plaintiff’s Request (the “Response”) [Dkt. No. 184], which Defendant L&M joined the same day [Dkt. No. 185]. Defendants’ Response proposes two modifications to the Request.

First, Defendants propose deleting deposition and document request topics 8 and 12, because those topics are the subject of motions to compel pending before Magistrate Judge Stickney. Plaintiff agrees that the Court’s decision on the motions to compel will determine whether these discovery topics should be included in the Request.

Second, Defendants’ Response proposes certain minor modifications to the language of the Request. Plaintiff has no objection to Defendants’ proposed edits.

Dated: February 2, 2012

Respectfully submitted,

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*Attorneys for Plaintiff*

**CERTIFICATE OF SERVICE**

The undersigned certifies that a true copy of the foregoing is being served electronically via ECF on all counsel of record on the 2th day of February 2012.

/s/Kennon Scott  
Kennon Scott